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13 *Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury, and Darren Uyenoyama*

15 [Additional Counsel Listed on Signature Page]

17 IN THE UNITED STATES DISTRICT COURT  
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
19 SAN JOSE DIVISION

21 **Cung Le, Nathan Quarry, and Jon Fitch, on  
behalf of themselves and all others similarly  
situated,**

23 **Plaintiffs,**

24 **v.**

25 **Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

27 **Defendant.**

Case Nos. 5:14-cv-05484-EJD; 5:14-cv-05591-EJD; 5:14-cv-05621-EJD; 5:15-cv-00521-EJD; 5:15-cv-01324-EJD

**STIPULATION EXTENDING BRIEFING  
SCHEDULE FOR DEFENDANT'S  
MOTION TO STAY DISCOVERY**

Date: September 10, 2015  
Time: 9:00 a.m.  
Courtroom: 4  
Judge: Hon. Edward J. Davila

5:14-cv-05484-EJD, 5:14-cv-05591-EJD  
5:14-cv-05621-EJD, 5:15-cv-00521-EJD  
5:15-cv-01324-EJD

**Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly situated,**

## **Plaintiffs,**

V.

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

## Defendant.

**Brandon Vera and Pablo Garza, on behalf of  
themselves and all others similarly situated,**

## **Plaintiffs,**

V.

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

## **Defendant.**

**Gabe Ruediger and Mac Danzig, on behalf of  
themselves and all others similarly situated,**

## **Plaintiffs,**

V.

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Kyle Kingsbury and Darren Uyenoyama, on behalf of themselves and all others similarly situated.**

### **Plaintiffs.**

v.

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC.**

**Defendant.**

5:14-cv-05484-EJD, 5:14-cv-05591-EJD  
5:14-cv-05621-EJD, 5:15-cv-00521-EJD  
5:15-cv-01324-EJD

1 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Vazquez, Dennis Hallman, Brandon Vera,  
 2 Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and Darren Uyenoyama (collectively,  
 3 "Plaintiffs") and Defendant Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC  
 4 ("Defendant"), pursuant to Civil Local Rule 6-2, request that the Court enter the parties' stipulation  
 5 below extending the time for Plaintiffs to respond to the Defendant's Motion to Stay Discovery (the  
 6 "Stipulation").

7 **FACTS UNDERLYING THE PARTIES' STIPULATION**

8 In support of their Stipulation, the parties offer the following facts:

9 A. Between December 16, 2014 and April 2, 2015, Plaintiffs filed five related class actions  
 10 against Defendant.

11 B. On January 15, 2015, the parties stipulated that Defendant would respond to Plaintiffs'  
 12 Complaints by February 27, 2015.

13 C. On January 30, 2015, Defendant filed a Motion to Transfer Venue to the District of  
 14 Nevada. This Motion is fully briefed and was argued and submitted on May 7, 2015.

15 D. On February 27, 2015, Defendant filed a Motion to Dismiss. This Motion is fully  
 16 briefed. The hearing on the motion is set for July 23, 2015.

17 E. On May 13, 2015, Defendant filed a Motion to Stay Discovery pending the Court's  
 18 decisions on Defendant's Motion to Dismiss and its Motion to Transfer Venue.

19 F. Pursuant to Civil Local Rule 7-3(a), Plaintiffs' Opposition to Defendant's Motion to  
 20 Stay is due on May 27, 2015.

21 G. The parties agree that party and judicial efficiency would be best served by permitting  
 22 Plaintiffs to have an extension to file their Opposition to Defendant's Motion to Stay Discovery and a  
 23 concomitant extension for the Defendant to file its Reply brief.

24 H. No previous extension has been sought as to this motion. This extension does not affect  
 25 the noticed hearing date or any other proceeding on the Court's calendar.

26 **STIPULATION**

27 In light of the above facts, the parties jointly request that the Court enter the following  
 28 Stipulation as the Order of the Court.

1. Plaintiffs shall file their Opposition to Defendant's Motion to Stay Discovery on or before June 3, 2015. The brief shall not exceed 25 pages.

2. Defendant shall file its Reply on or before June 17, 2015. The brief shall not exceed 15 pages.

3. Nothing in this Stipulation precludes Plaintiffs or Defendant from seeking to amend the filing deadlines set forth herein as permitted under the Local Rules if circumstances warrant.

## IT IS SO STIPULATED.

DATED: May 22, 2015

## JOSEPH SAVERI LAW FIRM, INC.

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*Fighting Championship and UFC*

7  
8  
9 Pursuant to Local Rule 5.1(i)(3), I attest that all of the above signatories listed, and on whose behalf the  
10 filing is submitted, concur in the filing's content and have authorized the filing.

11  
12 Dated: May 22, 2015

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

1 [PROPOSED] ORDER  
2  
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

By: \_\_\_\_\_

Honorable Edward J. Davila  
United States District Judge

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